

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,
Plaintiff,
v.
ARI TEMAN,
Defendant, Pro Se.

Case No.: 1:19-cr-00696

DEFENDANT’S PRO SE MOTION FOR RECONSIDERATION OF DOCKET 510,
NOTICE OF APPEAL ON DOCKETS 508 AND 510,
AND MOTION TO STAY ORDER TO RETURN TO THE USA PENDING APPEAL

TO THE HONORABLE COURT:

I, Ari Teman, Defendant appearing pro se, respectfully request reconsideration of the Court’s ruling in Docket 510 stating “There is no reason why Teman needs a new medical appointment to obtain his existing medical records,” as my doctor requires an in-person appointment and witnessed release form, to be in compliance with privacy requirements placed upon providers here, making compliance by March 4, 2025, impossible despite my good-faith efforts—it is now 6:25 PM and no records can be obtained today without the doctor’s mandated process.

Additionally, I provide notice of appeal on the orders in Dockets 508 and 510 and move to stay any order requiring my return to the USA pending appeal.

LEGAL ARGUMENTS FOR RECONSIDERATION

1. **Factual Misunderstanding:** The Court’s ruling in Docket 510 does not account for my doctor’s strict policy requiring an appointment and signed release, a condition beyond my control. Reconsideration is warranted to correct this misunderstanding and prevent unfairness. See Local Rule 6.3; *Shrader v. CSX Transp., Inc.*, 70 F.3d 255, 257 (2d Cir. 1995).
2. **Manifest Injustice:** Without more time, I face sanctions for non-compliance despite my inability to meet the deadline due to external constraints, justifying reconsideration to avoid injustice.

NOTICE OF APPEAL

I hereby provide notice of my intent to appeal the orders in Dockets 508 and 510 to the Second Circuit Court of Appeals, as I believe they contain errors affecting my rights and ability to comply with court directives fairly.

MOTION TO STAY ORDER TO RETURN TO THE USA

I respectfully move to stay any order requiring my return to the USA pending resolution of my appeal on Dockets 508 and 510.

A stay is warranted because:

- (1) I have a meritorious basis for appeal regarding the medical records and related rulings;
- (2) requiring my return violates my sincerely held religious beliefs as supported by the Chief Rabbi's letter at Docket 502-2, and the Court's reasoning—that it needs to monitor my mental health treatment—does not overcome this objection since my therapy is conducted over Zoom, and even if in-person therapy were required, an in-person therapist or therapy group leader could sign a sworn statement confirming compliance;
- (3) I will suffer irreparable harm if forced to return prematurely, including harm to my religious practice;
- (4) a stay will not substantially injure the government; and
- (5) the public interest favors ensuring fair process and religious accommodation. See *Hilton v. Braunskill*, 481 U.S. 770, 776 (1987) (factors for granting a stay); see *also* Religious Freedom Restoration Act (RFRA), 42 U.S.C. § 2000bb-1 (government must not substantially burden religious exercise absent a compelling interest and least restrictive means).

CONCLUSION AND RELIEF REQUESTED

I respectfully ask the Court to:

- (1) reconsider Docket 510 and extend the deadline for producing medical records;
- (2) acknowledge my notice of appeal on Dockets 508 and 510; and
- (3) grant a stay of any order to return to the USA pending appeal.

Dated: March 4, 2025

Respectfully submitted,

/s/ Ari Teman

Ari Teman

Defendant, Pro Se

Tel Aviv, Israel

4 March 2025 6:25pm

5th of Adar, 5785